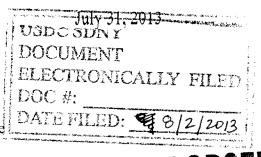
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BY HAND

The Honorable Frank Maas United States Magistrate Judge United States Courthouse 500 Pearl Street New York, New York 10007



ANG 01 2013

MEMO ELLONO

Re: Anwar, et al. v. Fairfield Greenwich Limited, et al. Master File No. 09-CV-00118 (VM) (FM)

Dear Judge Maas:

On behalf of all parties, we are writing to advise the Court that fact discovery was completed on June 30, 2013, except for certain disputes as to the adequacy of written discovery responses, Citco's Rule 72(a) appeal from the Court's July 8, 2013 Discovery Order, and some third-party depositions that pose unusual problems (and may never occur).

Pursuant to the Eighth Amended Case Management Plan filed January 30, 2013, plaintiffs' expert reports were due July 30, 2013, and we wish to advise the Court that the parties have agreed to certain adjustments in the schedule for service of expert reports. These changes reflect the need to incorporate into the reports large amounts of discovery material from recently-concluded fact discovery.

The parties have agreed that Plaintiffs' expert reports will be served August 2, 2013, with the exception of Plaintiffs' expert report on damages, which will be served August 23, 2013. The parties further agree to confer on dates for Defendants to serve responsive expert reports and Plaintiffs to serve reply reports consistent with the foregoing and the Case Management Plan, and will keep the Court apprised of these matters.

Thank you for your consideration.

Respectfully yours,

David A Barrett

cc: All counsel of record (via email)

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